

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA	:	
-v.-	:	AMENDED CONSENT ORDERS OF PROTECTION
	:	
DAVID KAUFMAN,	:	20 Cr. 577 (NSR)
a/k/a "David Khalifa,"	:	
a/k/a "John Morray,"	:	
a/k/a "Big Man,"	:	
Defendant.	:	
- - - - -	x	

WHEREAS, on or about October 26, 2020, DAVID KAUFMAN, a/k/a "David Khalifa," a/k/a "John Morray," a/k/a "Big Man" (the "defendant"), was charged in Indictment No. 20 Cr. 577 (NSR) (the "Indictment"), with transmitting interstate threats, in violation of 18 U.S.C. § 875 ("Count One"), and stalking, in violation of 18 U.S.C. § 2261A ("Count Two");

WHEREAS, on or about December 15, 2021, the defendant pled guilty to Count Two of the Indictment, pursuant to a plea agreement with the Government (the "Plea Agreement"), in which the defendant agreed that

the conditions of any term of supervised release imposed by the Court should include, and the defendant will not object to, the following terms of supervised release: (a) the defendant shall stay at least 100 yards away from the victims listed in Attachment A (the "Victims"); (b) the defendant shall stay at least 100 yards away from the home, school, business, and place of

employment of the Victims; (c) the defendant shall refrain from having any communication or any other contact, directly or through any other person, by mail, telephone, email, voicemail, social media, or any other means with the Victims; and (d) the defendant shall refrain from harassing, intimidating, threatening, or otherwise interfering with the Victims and members of the Victims' households[.]

(the "Orders of Protection") (Plea Agreement dated September 2, 2021, at 2);

WHEREAS, on or about April 14, 2022, at the defendant's sentencing, the Honorable Nelson S. Roman, United States District Judge, Southern District of New York, permitted the Government to add additional victims to Attachment A to be subject to the Orders of Protection, and the Government and the defendant by and through Michael Burke, Esq., counsel for the defendant, agreed that they would confer with respect to the additional victims;

WHEREAS, the defendant agrees the following:

the conditions of any term of supervised release imposed by the Court should include, and the defendant will not object to, the following terms of supervised release: (a) the defendant shall stay at least 100 yards away from the victims listed in Attachment B (the "Victims"); (b) the defendant shall stay at least 100 yards away from the home, school, business, and place of employment of the Victims; (c) the defendant shall refrain from having any communication or any other contact, directly or through any other person, by mail, telephone, email, voicemail, social media, or any other means with the

Victims; and (d) the defendant shall refrain from harassing, intimidating, threatening, or otherwise interfering with the Victims and members of the Victims' households[.]

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Damian Williams, United States Attorney, Assistant United States Attorney Jane Kim, of counsel, and the defendant, and his counsel, Michael Burke, Esq., that:

The following terms of supervised release, among others, shall be imposed on the defendant:

(a) the defendant shall stay at least 100 yards away from the victims listed in Attachment B (the "Victims");

(b) the defendant shall stay at least 100 yards away from the home, school, business, and place of employment of the Victims;

(c) the defendant shall refrain from having any communication or any other contact, directly or through any other person, by mail, telephone, email, voicemail, social media, or any other means with the Victims; and

(d) the defendant shall refrain from harassing, intimidating, threatening, or otherwise interfering with the Victims and members of the Victims' households.


AGREED AND CONSENTED TO:

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York
Attorney for Plaintiff


By: /s/ Jane Kim
JANE KIM
Assistant United States Attorney
One St. Andrew's Plaza
New York, NY 10007
(212) 637-2038

5/9/2022
DATE

DAVID KAUFMAN

By: 
DAVID KAUFMAN
Defendant

5/24/22
DATE

By: 
MICHAEL BURKE, ESQ.
Attorney for Defendant

5/24/22
DATE

SO ORDERED:

HONORABLE NELSON S. ROMÁN
UNITED STATES DISTRICT JUDGE

DATE

SEALED

SUBJECT TO THE PROTECTIVE ORDER OF NOVEMBER 18, 2020

ATTACHMENT A

The Victims, as referenced in the Plea Agreement, dated September 2, 2021,
include the following individuals:



SEALED

SUBJECT TO THE PROTECTIVE ORDER OF NOVEMBER 18, 2020

ATTACHMENT B

The Victims include the following individuals:

